

In the Matter of)
)
High-Cost Universal Service Support) WC Docket No. 05-337

Rock Hill Telephone Company d/b/a Comporium (“Comporium”) hereby files these comments in support of the modifications to the Dial Equipment Minute (DEM) weighting rules proposed by the Federal Communications Commission (FCC) in the Notice of Proposed Rulemaking issued in the above-captioned proceeding.¹ Comporium is a rural telephone company² serving communities primarily located in York County, South Carolina.

¹ *High-Cost Universal Service Support; Coalition for Equity in Switching Support Petition for Clarification*, WC Docket No. 05-337, Order and Notice of Proposed Rulemaking, FCC 09-89 (released October 9, 2009) (*NPRM*).

³ *NPRM*, ¶¶ 13, 15.

Comporium urges the Commission to adopt the proposed changes to the current DEM weighting rules as promptly as possible in order to eliminate the ongoing adverse impact of the rules on affected small incumbent LECs. Specifically, the existing rules assign a lower DEM weighting factor than is appropriate for an eligible LEC with its access line count. Consequently, affected small incumbent LECs receive less support for their switching costs than the Commission has determined is needed to enable these carriers to provide high-quality telephone services to their customers.⁴ Indeed, as the Notice indicates, a small carrier that gains and then loses access lines is in no meaningfully different situation than a similarly-sized carrier that experiences no gain or loss.⁵ The proposed amendments to sections 36.125(j) and 54.301(a)(2)(ii) of the FCC's rules⁶ would remedy this discriminatory and inequitable treatment of certain small rural carriers and, therefore, should be adopted promptly.

The increased amount of support arising from the rule change would be minimal – a mere tenths of a percent of the size of the Universal Service Fund.⁷ Indeed, the marginal increase would have no perceptible effect on the size of contributions from individual consumers. The benefits of the rule change, however, would be substantial for affected small and rural carriers. For small telephone companies serving sparsely populated areas, LSS revenues play an important role in maintaining quality service for

⁴ See, e.g., *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776 at n.780 (1997).

⁵ See *id.*, ¶ 14.

⁶ 47 C.F.R. §§ 36.125(j) and 54.301(a)(2)(ii).

⁷ See, *Jurisdictional Separations and Referral to the Federal-State Joint Board; Federal-State Joint Board on Universal Service*, CC Docket Nos. 80-286 and 96-45, Coalition for Equity in Switching Support Petition for Clarification at n.6 (filed Jan. 8, 2009).

customers at affordable rates, and for helping to finance necessary network improvements. The FCC has acknowledged the harm to a small rural carrier that the loss of LSS for only one year may cause.⁸ The loss of needed LSS assistance for several consecutive years – particularly at a time of declining access charge revenues – may make it financially impossible for affected carriers to make efficient upgrades to their network or to maintain service at the same level of quality.

In light of the hardship that inadequate switching support can impose, and given the extended period of time that the current rules have been in place, the FCC should implement the rule revisions immediately. Specifically, the FCC should adopt the proposed rules before the end of the year and should instruct the Universal Service Administrative Company to apply the new rules to LSS calculations for 2008 and 2009 calendar years.

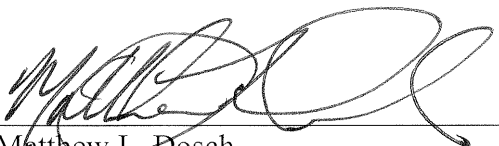
⁸ *Federal-State Joint Board on Universal Service; Dixon Telephone Company; Lexcom Telephone Company; Citizens Telephone Company of Higginsville, Missouri; Petitions for Waiver of Section 54.301 Local Switching Support Data Submission Reporting Date*, Order, 21 FCC Rcd 1717, ¶ 8 (2006).

Conclusion

For the reasons explained herein, Comporium supports the changes to sections 36.125(j) and 54.301(a)(2)(ii) of the FCC's rules proposed by the NPRM and strongly urges immediate implementation of the modifications and issuance of explicit instructions to use the new rules for 2008 and 2009 LSS calculations.

Respectfully submitted,

**ROCK HILL TELEPHONE COMPANY D/B/A
COMPORIUM**

A handwritten signature in black ink, appearing to read 'Matthew L. Dosch', is written over a horizontal line.

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